



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF HEALTH AND HUMAN SERVICES
LANSING

ROBERT GORDON
DIRECTOR

IV-D MEMORANDUM 2020-004

TO: All Friend of the Court (FOC) Staff
All Prosecuting Attorney (PA) Staff
All Office of Child Support (OCS) Staff

FROM: Erin P. Frisch, Director
Office of Child Support

DATE: February 21, 2020

SUBJECT: Behavioral Interventions in Child Support, Phase 2

ACTION DUE: None

POLICY EFFECTIVE DATE: Upon receipt

UPDATE(S):

☐ Manual

☐ Form(s)

PURPOSE:

This IV-D Memorandum shares the results of the review and modification intervention conducted by member offices of the Behavioral Interventions Workgroup (BI Workgroup) in the spring and summer of 2019. It also includes information on OCS's plans for working on a second phase of behavioral interventions with IV-D offices in 2020 and 2021.

This memorandum is informational only and does not introduce any new statewide policy or procedure.

DISCUSSION:

A. Background

In 2014, the federal Office of Child Support Enforcement (OCSE) awarded five-year grants to eight child support agencies under the Behavioral Interventions for Child Support Services (BICS) demonstration project. In 2018, OCSE chose several state and tribal IV-D programs to participate as BICS Peer Learning Sites. Michigan's Office of Child Support was one of the programs selected.

IV-D staff can refer to [IV-D Memorandum 2019-002, *Behavioral Interventions in Child Support*](#), for more information about behavioral economics, the BICS project, and Michigan's participation as a Peer Learning Site.

Michigan's BI Workgroup developed, implemented and evaluated a behavioral intervention with training and technical assistance from the OCSE BICS Project Support Team.

B. Michigan's Intervention: Review and Modification

Michigan's behavioral intervention was based on the problem statement that custodial parties (CPs) and non-custodial parents (NCPs) often do not participate in the review and modification process. This is problematic because the lack of participation can result in:

- Terminated reviews (wasted staff time and effort);
- Additional staff efforts to discover relevant financial information;
- Support amounts that do not reflect the parties' actual circumstances and ability to pay; and/or
- Additional time and effort spent by staff when parties object to a recommended order developed without their participation.

IV-D Memorandum 2019-002 provides detailed information on the steps the BI Workgroup took to analyze the problem, diagnose bottlenecks in the review and modification process, and design an intervention to address some of the behavioral issues identified.

Seven county offices participated in the review and modification intervention. OCS staff took the following actions in the intervention that are not taken in the usual review and modification process:

1. Sent a postcard to CPs and NCPs a few days before they received the *Notice of Support Review*;
2. Sent the CP and NCP a revised version of the *Notice of Support Review* in a non-standard envelope;¹
3. Gave some CPs and NCPs an opportunity to provide review information through a telephone or in-person interview rather than completing the *Case Questionnaire* (FOC39); and
4. Provided follow-up phone calls, emails, and/or text messages to CPs and NCPs if the office received no response to the *Notice of Support Review*.

¹ The *Notice of Support Review* (RNMRVWNOT) is generated by the Michigan Child Support Enforcement System (MiCSES). For the intervention, OCS created an alternate version of the *Notice of Support Review* that contained simpler language, additional information about the review process, and email addresses and phone numbers that customers could use to ask questions about the review.

The intervention included reviews that were conducted at the request of the CP or NCP, reviews that were conducted at the initiative of the FOC office, and court-ordered reviews. It excluded automatic three-year public assistance reviews.

C. Evaluation and Analysis

1. Evaluation

The OCS Planning, Evaluation and Analysis (PEA) team compiled intervention data from spreadsheets submitted by the offices that participated in the review and modification intervention and conducted an evaluation of that data.

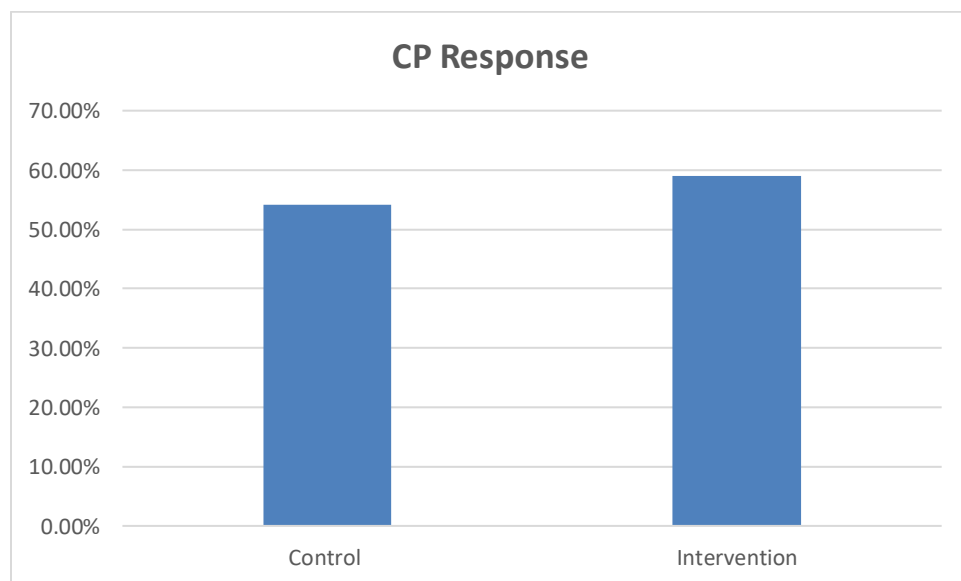
The BI Workgroup primarily wanted to find out whether the intervention increased CP and NCP responses in the review and modification process. The workgroup also wanted to learn whether or not the intervention affected:

- The number of reviews completed, as opposed to terminated;
- The use of review data from third-party sources; and
- The number of objections received.

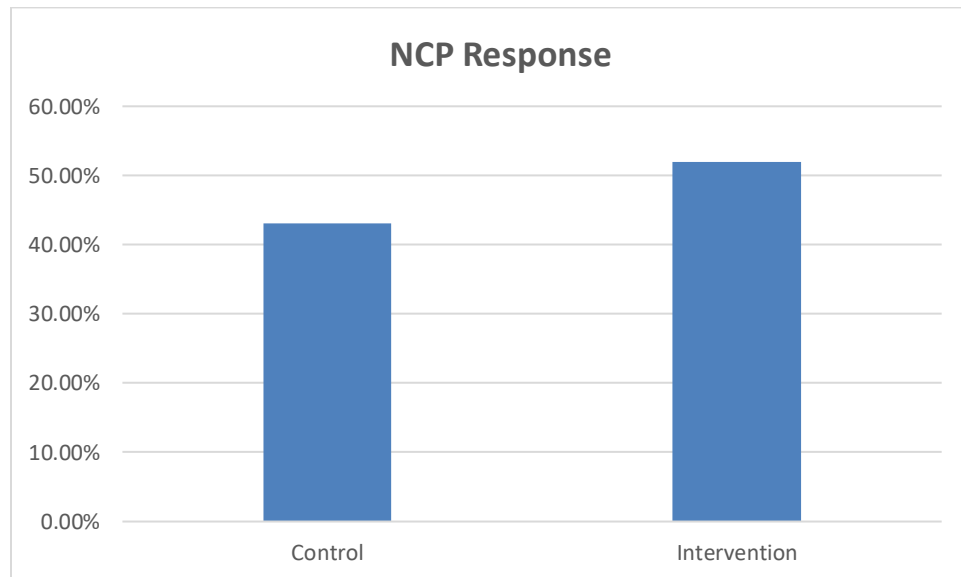
a. CP and NCP Responses

OCS PEA determined that the interventions resulted in a statistically significant increase in the responses of both CPs and NCPs.

In the non-intervention (or “control”) reviews, CPs responded 54.2% of the time, compared to 59% of the time in the intervention reviews.

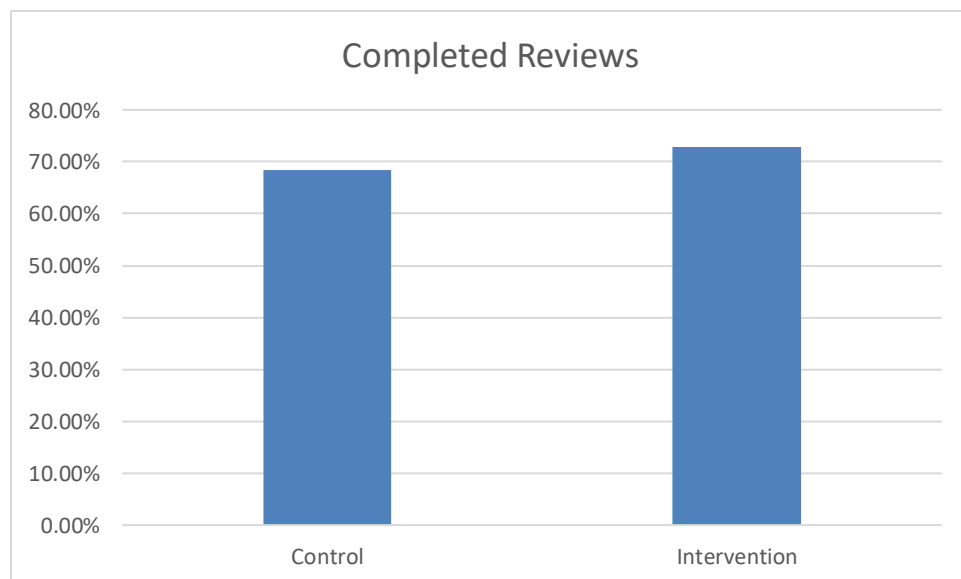


In the control reviews, NCPs responded only 43.1% of the time. In the intervention reviews, NCPs responded at a rate of 52.0%.



b. Completed Reviews

The intervention also resulted in a slight increase in completed reviews (68.4% in the control group, compared to 72.9% in the intervention group). This result is different enough to be considered statistically significant.



c. Use of Third-Party Review Data and the Number of Objections Received

For the other questions (use of third-party data for the review and the number of objections received), the data did not show a significant difference between the control and intervention groups.

2. Analysis

While OCS PEA's evaluation demonstrates that the intervention made a difference in the response rates and the number of completed reviews, the evaluation was not able to explain which element(s) of the intervention actually "moved the needle." The intervention consisted of many departures from the standard review and modification process, and there was no quantitative data available to show what caused the improvements to the numbers (e.g., Was it the postcard, the revised *Notice of Support Review*, etc.?).

The BI Workgroup members discussed the evaluation findings and provided a qualitative analysis. Based on their experiences during the intervention, the workgroup members agreed that the majority of the improvement in response rates could be attributed to the follow-up step (i.e., action #4 under Section B above). Offices that spent more time and devoted more resources to follow-up activities (e.g., phone calls, emails, and text messages) saw greater increases in their CP and NCP response rates.

Many offices also attributed the increased response rates to the revised *Notice of Support Review* (i.e., action #2 under Section B above). The revised notice used simpler language, included additional information about the review process, and provided dedicated email addresses and phone numbers that customers could use to ask questions about the review.

The Kent County FOC office has continued to use a modified version of the *Notice of Support Review* in their support review process after the conclusion of the intervention. The office compared a test group of reviews that used the revised notice (and no other intervention components) with the control group from the intervention, and found that the use of the revised notice alone resulted in an increased NCP response rate (41.3% in the control group and 46.5% in the test group).

The Kent County notice is attached to this memorandum (Ref: [Exhibit 2020-004E1](#)).²

² Offices sending forms that are not generated from MiCSES must document the sending of those forms in MiCSES.

D. BI Workgroup's Recommendations

1. Recommendations to Offices Doing Review and Modification Work

Based on the results and experiences of the interventions, the BI Workgroup provides the following recommendations to offices doing review and modification work. These recommendations may help improve CP and NCP engagement with the review and modification process.³ OCS intends to include these recommendations in a future publication of Section 3.45 of the *Michigan IV-D Child Support Manual*.

a. Dedicated Phone Line or Email Address

Offices (especially those with larger caseloads) should consider providing CPs and NCPs with a dedicated phone line or email address to direct questions regarding review and modification. Offices should then staff the email box or phone line with experienced review and modification professionals. At least one participating office chose to continue this practice after the conclusion of the intervention.

b. Follow-Up Communication

Currently, MiCSES automatically sends a second *Notice of Support Review*⁴ if the CP or NCP fails to return information by the deadline. Rather than send a second notice by mail, offices participating in the intervention followed up with these CPs or NCPs by phone, email or text message.⁵

Of the three follow-up methods, contacting a CP or NCP by telephone yielded the most success. Reminding CPs or NCPs that the review was pending and the office needed input was often sufficient to move the review along. However, telephone reminders also resulted in more work than the other two follow-up methods. Once a CP or an NCP had FOC staff on the phone, they often asked questions beyond the support review process. In some offices, this proved time-consuming.

The BI Workgroup recommends that offices follow up using one or more of these three methods rather than solely relying on MiCSES to send a second *Notice of Support Review*.⁶ While the follow-up process is labor-intensive, it

³ Ref: [Section 3.45, "Review and Modification," of the Michigan IV-D Child Support Manual](#) for more information about the tracking of CP and NCP engagement during the review process.

⁴ This is the *Notice of Support Review – Second Request* (RNM2NDRVWNOT) in MiCSES.

⁵ Offices must ensure that all communications adhere to policy established in [Section 1.10, "Confidentiality/Security," of the Michigan IV-D Child Support Manual](#). Email and text communication may occur securely through the MiChildSupport Portal. See [Section 1.35, "MiChildSupport Portal," of the Michigan IV-D Child Support Manual](#) for more information.

⁶ Ref: Section 3.45 of the *Michigan IV-D Child Support Manual* for information on when MiCSES sends the second notice and how to prevent it from generating.

can provide parties with a better understanding of the review process and improve responses. Anecdotally, in some cases, the follow-up seems to have also improved parties' perceptions of the child support program, thus advancing its Strategic Plan goal of improving the customer experience.

2. Recommendation to the Program Leadership Group (PLG)

The BI Workgroup has also made a recommendation to the PLG. When the workgroup analyzed behavioral bottlenecks in the review and modification process, one of the most serious bottlenecks the group identified was the hassle caused by the absence of an online case questionnaire. Because OCS authorized the group's charter with the understanding that little to no system work would be done to support the intervention, the group could not test an online case questionnaire as part of its intervention.

The BI Workgroup recommended to the PLG that Michigan's IV-D program pursue functionality that would permit parents to complete the *Case Questionnaire* online, whether through Michigan Legal Self-Help, through the MiChildSupport Portal, or by some other means. Although this has not been tested in an intervention, the child support program has demonstrated through other work (e.g., the availability of the e1201 and e842⁷) that child support customers have a strong desire to complete forms online when possible.

3. Recommendations Regarding Forms

- a. Members of the BI Workgroup provided feedback to the Enforcement Work Improvement Team (ENF WIT) regarding the *Case Questionnaire*. Feedback included the identification of superfluous fields and confusing language. The ENF WIT has formed a subcommittee to work on revisions to the form.
- b. OCS is working to make recommendations to the Interagency Forms Committee regarding the *Notice of Support Review*, including the use of friendlier language, icons, and frequently asked questions (FAQs).

E. Phase 2 of Michigan's Behavioral Interventions Work

The PLG approved the BI Workgroup's charter in the summer of 2018. At that time, the charter indicated that the workgroup would complete its behavioral intervention project as a BICS Peer Learning Site by September 30, 2019. It also indicated that the workgroup would then decide whether to disband or to continue behavioral intervention work in Michigan without the ongoing assistance of the OCSE BICS Project Support Team.

⁷ Ref: [Section 2.05, "Referrals and Applications," of the Michigan IV-D Child Support Manual](#) for information on the e1201 and e842.

Through study, discussions, work with mentor sites and the BICS Project Support Team, and trial-and-error during the review and modification intervention, the BI Workgroup had gained knowledge that it wanted to share with the rest of Michigan's child support program. The workgroup discussed its thoughts with the PLG, and in November 2019, the PLG approved Phase 2 of Michigan's behavioral intervention work.

In this second phase, the BI Workgroup intends to transform itself. Some of the original BI Workgroup members will remain and act as mentors to future behavioral intervention sites. Phase 2 interventions will not be limited to a single theme; offices will be able to identify and work on any problem they choose.

1. BI Assistance for Interested Offices

The BI Workgroup learned that it is difficult to design a single behavioral intervention that works equally well in different offices. Due to the varying sizes of the offices and the differences in business processes, something that works well in one office may be cumbersome in another. Nevertheless, the workgroup recognizes that there is an advantage to sharing ideas and information with others who do things differently. In this second phase, offices will work on individual interventions while still benefiting from the exchange of ideas with others working on a similar problem.

Phase 2 activities will consist of the following:

a. Introductory Webinar

All interested child support offices in Michigan may learn about behavioral economics and problem identification in an introductory webinar.

b. Proposal Submission

After the webinar, interested offices may submit proposals for behavioral interventions they would like to undertake within their individual offices. Each office will customize its own intervention, based on its own needs.

The template for the proposal has not yet been finalized; however, it will be a one- or two-page document based on the BICS "Defining the Problem" worksheet (Ref: [Exhibit 2020-004E2](#)). The submitting office need not have an entire intervention planned at the proposal stage.

c. Proposal Review and Approval

OCS and State Court Administrative Office (SCAO) staff, as well as mentors who were involved with the review and modification intervention, will review the proposals. If more offices submit proposals than can be accommodated,

preference will be given to the proposals that best exemplify the priorities laid out in the [Michigan Child Support Program's Strategic Plan](#):

- Improve Child Support Processes;
- Improve the Customer Experience;
- Improve Education and Outreach; and
- Improve Data Tools and Implement Technology.

Offices will then be grouped according to the type of intervention they plan to conduct (e.g., noncooperation interventions, service of process interventions, enforcement interventions, etc.). Exact groupings will depend on what types of proposals offices submit.

d. Planning, Conducting and Evaluating the Intervention

Participating offices are expected to plan, create, carry out, and evaluate a behavioral intervention with help from OCS and BI Workgroup mentors. While OCS will provide technical assistance, it is unable to provide any financial or system support for interventions. OCS may allow flexibility under its child support policies if an office requests consideration (i.e., a “policy waiver”).

All participating offices will attend ongoing instructional webinars. The groups of offices will work in between the webinars with OCS and SCAO staff, and with the mentors who participated in the review and modification intervention.

2. Tentative Timeline

Spring 2020	OCS shares information about results of the review and modification intervention, and about the next phase of behavioral interventions work with IV-D partners (information will be shared in this IV-D Memorandum, conference presentations, WITs and Workgroups, etc.)
June 2020	Webinar – Introduction to behavioral economics/problem identification, providing guidance on submitting proposals
June/July 2020	Interested offices submit proposals; OCS, SCAO, and mentors split offices into groups of similar interventions
August 2020	Webinar – Diagnosing bottlenecks
August/Sept. 2020	Participating offices diagnose their bottlenecks
October 2020	Webinar – Intervention design
October/Nov. 2020	Participating offices design their intervention
November 2020	Webinar – Evaluation
November/Dec. 2020	Participating offices establish their evaluation approach
January – April 2021	Participating offices conduct their interventions
May/June 2021	Participating offices share results

OCS will announce the introductory webinar through a Help Desk notification. If any office staff would like more information before then, they may contact Julie Vandenboom, OCS Program Re-Engineering Specialist, at vandenboomj@michigan.gov.

NECESSARY ACTION:

Retain this IV-D Memorandum until further notice.

Office staff should consider participating in the introductory webinar when it is announced in spring 2020 to learn about BI and how they can use it to enhance performance and service. Participation is not considered a commitment to submit a proposal.

REVIEW PARTICIPANTS:

Behavioral Interventions Workgroup
Program Leadership Group

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ATTACHMENTS:

Exhibit 2020-004E1: Kent County *Notice of Support Review*

Exhibit 2020-004E2: BICS “Defining the Problem” Worksheet

EPF/JJV